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JENNER & BLOCK LLP

December 23, 2024

VIA ECF

The Honorable George B. Daniels United States District Judge Daniel Patrick Moynihan United States Courthouse 500 Pearl Street New York, NY 10007

The Honorable Sarah Netburn United States Magistrate Judge Thurgood Marshall United States Courthouse 40 Foley Square New York, NY 10007 USDC SDNY
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Re: In re Terrorist Attacks on September 11, 2001, No. 03-md-1570 (GBD) (SN)

Request for Extension to File Response to Ashton Plaintiffs' Motion for Service of Judgment (MDL Dkt. 10626)

Dear Judge Daniels and Magistrate Judge Netburn:

On behalf of the Joint Creditors¹, and with the consent of the Consolidated Ashton Plaintiffs, we submit this letter to request a fourteen-day extension of the deadline to file a response to the Ashton Plaintiffs' motion of December 12, 2024, which seeks the Court's authorization for alternative service of partial final judgments against the Taliban on the Taliban and Da Afghanistan Bank. See MDL Dkt. 10626 at 3.

The Joint Creditors are working together to consider the Ashton Plaintiffs' motion and, if warranted, coordinate their response to the motion. Given the need to coordinate legal positions across several groups of judgment creditors, as well as general unavailability during the holiday season, the Joint Creditors request a fourteen-day extension of the fourteen-day deadline. Currently, a response to the motion is due December 26, 2024. The Joint Creditors propose that the deadline be extended to January 9, 2024. The Ashton Plaintiffs have kindly consented to this proposed extension.

This is the Joint Creditors' first request for an extension of this deadline. We thank the Court for its consideration of this request.

¹ The Joint Creditors are the Plaintiffs in the following cases: Smith v. The Islamic Emirate of Afghanistan, et al., No. 01-cv-10132 (the "Smith Creditors"), Havlish, et al. v. Bin Laden, et al., No. 03-cv-9848 (the "Havlish Creditors"), Fed Ins. Co., et al. v. Al Qaida, et al., No. 03-cv-6978 (the "Federal Insurance Creditors"), and John Does 1 Through 7 v. The Taliban, et al., No. 20-mc-740 (the "Doe Creditors"). See MDL Dkt. 8866 at 1 n.1.

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Respectfully submitted,

/s/ Douglas A. Mitchell

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/s/ Orlando do Campo

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/s/ James Edwin Beasley

James Edwin Beasley

The Beasley Firm, LLC

The extension request is GRANTED. The Joint Creditors have until January 9, 2025, to file a response. **SO ORDERED.**

ARAH NETBURN

United States Magistrate Judge

Dated: December 23, 2024

New York, New York